

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**DECLARATION OF
EMANUEL KATAEV, ESQ. AS TO
SERVICE IN ACCORDANCE
WITH THIS COURT'S
SCHEDULING ORDER DATED
FEBRUARY 20, 2025**

Emanuel Kataev, Esq., declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am admitted to practice before this Court and am a member of Sage Legal LLC, who – together with Milman Labuda Law Group PLLC – are the attorneys for the Plaintiff IME WatchDog, Inc. (hereinafter “Plaintiff” or “IME WatchDog”) in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of the file maintained by this office.

3. On Thursday, February 20, 2025, I forwarded a copy of this Court’s Order of the same date to Ignatius Grande, Esq. of Berkeley Research Group, LLC via email to igrande@thinkbrg.com. A copy of the email is annexed hereto as **Exhibit “A.”**

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 25, 2025.

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.

EXHIBIT A

Emanuel Kataev

From: Ignatius Grande <igrande@thinkbrg.com>
Sent: Thursday, February 20, 2025 2:12 PM
To: Emanuel Kataev
Cc: Jamie Felsen; Daniella Levi; Eli Levi; carlos@imewatchdog.com
Subject: Re: [EXT] FW: Activity in Case 1:22-cv-01032-PKC-JRC IME WatchDog, Inc. v. Gelardi et al Scheduling Order

Follow Up Flag: Follow up
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Emanuel,

Thank you. I am confirming receipt of your email and will note the new time in my calendar.

Best,

Ignatius

Sent from my iPhone

On Feb 20, 2025, at 2:05 PM, Emanuel Kataev <emanuel@sagelegal.nyc> wrote:

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U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 2/20/2025 at 2:02 PM EST and filed on 2/20/2025

Case Name: IME WatchDog, Inc. v. Gelardi et al

Case Number: [1:22-cv-01032-PKC-JRC](#)

Filer:

Document Number: No document attached

Docket Text:

SCHEDULING ORDER: The Show Cause hearing previously scheduled for 11:30 am ET on Wednesday, April 2, 2025, will now take place at 2:00 pm ET on the same day. Plaintiffs should provide Mr. Grande with notice of the updated time, and file with the Court proof of the same by February 27, 2025.

The Court will send the parties the Zoom link in advance of the conference. The public may listen in via telephone at: +1 (646) 828-7666; Meeting ID: 161 449 7871; Passcode: 812159.

Ordered by Judge Pamela K. Chen on 2/20/2025. (JJB)

1:22-cv-01032-PKC-JRC Notice has been electronically mailed to:

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